

**DECLARATION OF JEFFERY K. SPELLERBERG**

I, Jeffery K. Spellerberg, in support of UNOPPOSED NOTICE OF MOTION FOR DISMISSAL AND MOTION FOR VOLUNTARY DISMISSAL PURSUANT TO FED. R. 41(a)(2) OF 2<sup>ND</sup> AMENDED COUNTERCLAIMS OF DADBIN BAHRAM WITH PREJUDICE AND PROPOSED ORDER TO DISMISS in Case 2:15-cv-05633-JVS-PLA, say and declare as follows:

1. I am an attorney at law, duly licensed to practice and practicing in the State of California and in the United States District Court for the Central District of California and the United States 9<sup>th</sup> Circuit court, on behalf of the Law Offices of Jeff Spellerberg, attorneys for Defendants and Counterclaimants herein, and as such make this declaration from facts within my personal knowledge and if called upon to testify could so competently testify thereto.
2. On October 22, 2021, I spoke with lead counsel for Counterclaimants, Dr. Dariush Adli, and discussed this Motion and the accompanying Proposed Order with opposing counsel for the Counterdefendants, and Dr. Adli stated he will not oppose either the Motion or the Proposed Order.

I declare under penalty of Perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 22, 2021 in Knoxville, Tennessee.

Law Offices of Jeff Spellerberg

/s/ Jeffery K. Spellerberg

Jeffery K Spellerberg

Attorney for Counterclaimant Bahram Dadbin